## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF MARYLAND GREENBELT DIVISION

04 16010 1 00

| In re:  | ) Case No. 24-16212-L | .55 |
|---|-----------------------|-----|
| Exquisite Quarters, LLC                                   | ) (Chapter 11)        |     |
| Debtor.   | )                     |     |
| WCP Fund I LLC as Servicer for Pacific RBLF Funding Trust |                       |     |
| Movant,   | )<br>)                |     |
| v.  | )                     |     |
| Exquisite Quarters, LLC                                   | )                     |     |
| Respondent.   | )<br>)                |     |

## NOTICE OF MOTION FOR RELIEF FROM STAY AND HEARING THEREON

WCP Fund I LLC as Servicer for Pacific RBLF Funding Trust has filed papers with the court seeking relief from the automatic stay of 11 U.S.C. § 362(a) to enable it to proceed to foreclose the property located at 19117 N. Kindly Court, Montgomery Village, Maryland 20886. Your rights may be affected. You should read these papers carefully and discuss them with your lawyer. (If you do not have a lawyer, you may wish to consult one.)

If you do not want the court to grant the motion for relief from stay, or if you want the court to consider your reviews on the motion, then by October 25, 2024 (parties served by mail may add three (3) additional days to the response deadline) you or your lawyer must file a written response with the Clerk of the Bankruptcy Court explaining your position and mail a copy to:

Maurice VerStandig The VerStandig Law Firm, LLC 9812 Falls Road, #114-160

## Potomac, Maryland 20854

If you mail rather than deliver, your response to the Clerk of the Bankruptcy Court for filing, you must mail it early enough so that the court will receive it by the date stated above.

The hearing is scheduled for Monday, November 18, 2024 at 2:00 pm in Courtroom 3-D at 6500 Cherrywood Lane, Greenbelt, Maryland 20770.

If you or your lawyer do not take these steps by the deadline, the court may find that you do not oppose the relief sought in the motion and may grant or otherwise dispose of the motion before the scheduled hearing date.

Respectfully submitted,

Dated: October 11, 2024 By: /s/ Maurice B. VerStandig

Maurice B. VerStandig, Esq.

Bar No.: 18071

The VerStandig Law Firm, LLC 1452 W. Horizon Ridge Pkwy, #665

Henderson, Nevada 89012 <u>Phone/Fax</u>: (301) 444-4600 <u>E-mail</u>: mac@mbvesq.com <u>Counsel for WCP Fund I LLC</u>

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 11th day of October, 2024, a copy of the foregoing was served electronically upon filing via the ECF system, with copies to:

- Linda M. Dorney ldorney@rosenblattlaw.com
- Lynn A. Kohen lynn.a.kohen@usdoj.gov
- Richard B. Rosenblatt rrosenblatt@rosenblattlaw.com, ldorney@rosenblattlaw.com;sgonzalez@rosenblattlaw.com;wilbertrr41309@notify.bestc ase.com
- US Trustee Greenbelt USTPRegion04.GB.ECF@USDOJ.GOV
- Maurice Belmont VerStandig mac@mbvesq.com, lisa@mbvesq.com;mahlon@dcbankruptcy.com;mac@dcbankruptcy.com;verstandig.mau ricer104982@notify.bestcase.com;verstandiglaw@recap.email

I FURTHER CERTIFY that on this 11<sup>th</sup> day of October, 2024, this notice is also being served via US Mail, postage prepaid, on all parties on the attached mailing matrix.

/s/ Maurice B. VerStandig
Maurice B. VerStandig, Esq.